

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

2007 NOV 26 A 10: 08

U.S. DISTRICT COURT
DISTRICT OF MASS.

Theodus Jordan/Plaintiff

V

Boston Public Schools /Defendants

Civil Action No.
04-cv-10688 NMG

MEMORANDUM: A MOTION IN OPPOSITION TO DEFENDANTS(BPS) TO PLAINTIFF'S MOTIONS FOR RECONSIDERATION AND/OR NOTICE OF APPEAL OF SUMMARY JUDGEMENT FROM JUDGE N.M. GROTON and OPPOSITONS TO DEFENDANTS(BPS) MOTION TO STRIKE DOCUMENTS ATTACHED TO PLAINTIFF'S MOTION, Dated 9/29/07, RESPECTIVELY :

HERE COMES, the plaintiff in the above matter now before this Most High Federal District Court of this most important matter of life survival and justice. The defendants have caused intractable Injury for more than 25 years by denying this plaintiff life, liberty, and his pursuit of happiness by lying (falsifying documents) failing to apply and provide equal treatment in hiring, promotion, giving equal access, equal opportunity. In addition, by blacklisting, retaliating, discriminating based on my race, color, gender, age, and disability (ies). This defendant(BPS) has caused grave and irreparable damage , as well as , irretrievable harm which cannot be restored to this plaintiff's career and his ability to gain qualified employment, housing, support for family, livelihood, transportation, food, clothing shelter, having to subsist on poverty level means.

This defendant (BPS) has lied again in its Motion to this Court... in that every document listed in my previous motion is in the original documents sent to this Court. Also, this defendant (Boston Public Schools-BPS) lied while they have denied this plaintiff access to his own records while defendants, without my permission, invades my right to privacy and have access to plaintiff's records at will, and without authority . This defendant has

engaged in conspiracy to deny this plaintiff unfettered access while it enjoys free access to plaintiff's entire records, files, and other documents at its pleasure.

This defendant has lied also when it claimed these documents were not in the original files, while it has proceeded to hide these documents from the Courts. Plaintiff has sent another request or demand to the BPS records department with this motion, demanding his entire record from all sources in that the first request was only partially filled because this defendant according to plaintiff's sources has conspired to suppress plaintiff's access to his own entire records while defendants enjoy free and unfettered access at will.

The error of this Court is because it is based on the deceptive practices of this defendants racially motivated tactics based on strongly held stereotypes about the competence or lack of competence of "blacks" in general never any concrete evidence as when whites are examined from a distance as blacks are, whites are totally accepted, but black are totally rejected given the same apriority examinations. This Court has accepted, without trial, hearing, or mediation the racially charged evaluation of this defendants who has for decades denied this plaintiff employment, promotions, and his tenure and livelihood based purely upon its speculation not any interviews, or personal examinations, only racial images and unexamined criterion.

Plaintiff deserves a trial and his Day-in-Court on such controversial matters contained in this complaint, especially in such a racist environment as this system and America's increasing hate-mongering events, especially for educational purposes. The legal issues cannot be resolved without fairness and equal treatment under the law. So far, no law has been applied except to defend the defendants' accusations about this plaintiff "so called, 'lack of qualifications'". Or, whether he was qualified for the positions he had applied for or not.

All items presented by plaintiff deserve total examination by his peers and knowledgeable expert evaluation and opinion of those who are qualified legally to do so. Since, the Judge and the Defendants have such knowledge and expertise on their side and since they are both white with their "whiter" perspectives on the world, there cannot be any doubt in this plaintiff's mind that no justice is served in rendering A Summary Judgment in this matter.

Wherefore, plaintiff plead for a fair and equitable trial, complete with a jury of his peers and those who have most knowledge about his day-to-day performance in the interest of **Fairness, Equality**, and most assuredly, if there is to be any modicum of **Justice**, in this matter.

Signed under the pains and penalties of perjury this day, November 21, 2007, by plaintiff,


Theodus Jordan

P.O. Box 840

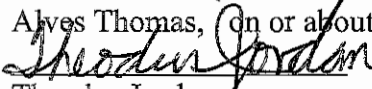
Jamaica Plain, MA 02130

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NOTE: TO THE HONORABLE COURT; Even though defendants' motion is dated October 30, 2007, this plaintiff only received it from his post office on November 16, 2007—please see signed returned receipt.

CERTIFICATE OF SERVICE

A true copy of this document was mailed by pre-paid postage to this defendant to last known address (26 Court Street, 7th. Floor, Boston, MA 02108) % Attorney Andrea Alves Thomas, on or about November 26, 2007 . , by this plaintiff,


Theodus Jordan